

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO	
PETER DAVID SCHIFF	CIVIL NO. 24-01511
Plaintiff,	
v.	
INTERNAL REVENUE SERVICE (IRS) et al.,	TRIAL BY JURY DEMANDED
Defendants,	

**MOTION FOR LEAVE TO FILE AN AMENDED COMPLAINT TO IDENTIFY ADDITIONAL
DEFENDANTS AND INCORPORATE NEWLY DISCOVERED EVIDENCE**

TO THE HONORABLE COURT:

COMES NOW Plaintiff Peter Schiff, through the undersigned attorney, and respectfully states and prays as follows:

I. INTRODUCTION

1. Pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, Plaintiff respectfully moves this Honorable Court for leave to file a First Amended Complaint to substitute previously unnamed defendants, now newly identified and to incorporate material facts revealed through recent Freedom of Information Act (FOIA) disclosures and independent investigation.
2. This amendment seeks to name additional federal officials, a foreign governmental communications director, and Puerto Rico regulatory personnel as defendants, in both their personal and official capacities, for their direct and intentional roles in a multi-agency conspiracy that resulted in the unlawful closure of Euro Pacific Bank and the public defamation of its principals, including Plaintiff.

II. BASIS FOR AMENDMENT

3. Since the filing of the original Complaint, Plaintiff has obtained substantial evidence revealing that the Internal Revenue Service (“IRS”)—acting in concert with the Australian Taxation Office (“ATO”) and the Office of the Commissioner of Financial

Institutions of Puerto Rico (“OCIF”)—coordinated the closure and public condemnation of Euro Pacific Bank in violation of Plaintiff’s constitutional rights.

4. Specifically, Plaintiff seeks to add as named defendants the following individuals:

- a. **Guy Ficco**, IRS official, in his personal and official capacities;
- b. **Gary Sharply**, IRS official, in his personal and official capacities;
- c. **Julia Holt**, Director of Crime and Fraud Communications, ATO, in her personal and official capacities;
- d. **Monica Rodriguez**, former OCIF Sub-Commissioner, in her personal and official capacities;
- e. **Karem Rosario**, OCIF Auxiliary Commissioner, in her personal and official capacities.

5. FOIA disclosures demonstrate that IRS agents Ficco and Sharply were instrumental in the behind-the-scenes orchestration of the July 2022 enforcement operation against Euro Pacific Bank, known internally as part of the “Atlantic” initiative. These individuals coordinated media efforts and briefing strategies with OCIF and J5 counterparts to ensure maximum international visibility.

6. Additionally, communications reveal that Julia Holt of the ATO directly coordinated with IRS communications staff to script and broadcast the July 2022 press conference, intentionally portraying Euro Pacific Bank and its owner in a false and defamatory light to amplify J5’s public relations objectives.

7. Further, documentary evidence shows that OCIF officials **Monica Rodriguez** and **Karem Rosario** participated in high-level planning meetings with IRS, J5 and ATO agents, where they advised OCIF Commissioner **Natalia Zequeira** on how to present the closure of Euro Pacific Bank as an independent regulatory decision, despite the operation having been pre-negotiated and scripted by foreign officials.

8. These individuals are liable for their personal actions taken under color of law and for exceeding their lawful authority in orchestrating a targeted enforcement and media campaign that lacked substantive legal or regulatory basis.

III. TIMELINESS AND GOOD FAITH

9. This request is made in good faith and without undue delay. The new allegations are based on recently disclosed communications and evidence not previously available to Plaintiff.

10. No party will be prejudiced by the allowance of this amendment, and the interests of justice strongly favor the adjudication of all claims against all involved actors.

IV. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court:

1. Grant leave to file the attached First Amended Complaint, pursuant to Fed. R. Civ. P. 15(a)(2);
2. Allow the addition of IRS agents Guy Ficco and Gary Sharply, ATO official Julia Holt, and OCIF officials Monica Rodriguez and Karem Rosario, all in their personal and official capacities, as named defendants.
3. Permit the incorporation of newly discovered evidence critical to the prosecution of Plaintiff's claims; and
4. Grant such other and further relief as the Court deems just and proper.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that on this date, we electronically filed the foregoing Motion with the Clerk of the Court using the CM/ECF system, which will send notification to all parties of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 31st day of July 2025.

s/ Ismael Torres-Pizarro

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